

EXHIBIT 4

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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SUSAN COONEY,
Plaintiff,

No. 04-11572JLT

vs.

SAYBROOK GRADUATE SCHOOL
AND RESEARCH CENTER and
MAUREEN O'HARA, Individually,
Defendants.

COPY

Deposition of
ARTHUR BOHART

Monday, June 12, 2006

NOTICING ATTORNEY: PAUL W. MORENBERG

REPORTED BY: JANICE M. JOBE, CSR NO. 4734

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1 A. No.

2 Q. Okay. I've copied your letter and excerpted
3 several pages from the exhibit which is -- which would
4 be over 300 pages.

5 MR. MORENBERG: Could you mark that as the
6 next exhibit. It should be tabbed C.

7 (Plaintiff's Exhibit No. 118

8 was marked for identification.)

9 MR. MORENBERG: Q. Dr. Bohart, the first page
10 of Exhibit 118 is your cover letter to me dated June 7,
11 2006?

12 A. Yes.

13 Q. The second page of that is the first -- is the
14 second page of the document of the package you sent me.
15 Do you recognize that?

16 A. Yes.

17 Q. And can you tell me when you first received or
18 gathered these documents?

19 MR. VARTAIN: Objection; compound.

20 THE WITNESS: Spring 2003.

21 MR. MORENBERG: Q. And how did you come to
22 possess these documents?

23 A. I downloaded this from the ASPPB website.

24 Q. What's the significance of the notation "2001 I
25 think" at the top of this page?

1 A. I believe this was published in 2001 and I
2 wrote that on there.

3 Q. So that "2001 I think" is your handwriting?

4 A. Yes.

5 Q. And if it was published in 2001, how was it
6 that you downloaded it in 2003?

7 A. We were working on preparing the February 2004
8 letter.

9 Q. To clarify, it's your testimony that these
10 documents which you downloaded in 2003 from the website
11 for the Association of State and Provincial Psychology
12 Boards reflected information from 2001?

13 MR. VARTAIN: Objection; ambiguous,
14 argumentative.

15 MR. MORENBERG: I'd just like to state for the
16 record that that sounds like a form objection to me, so
17 the word "objection" should be sufficient.

18 Q. Dr. Bohart, could you answer?

19 A. Could you repeat the question?

20 MR. MORENBERG: Can the reporter read the
21 question back to the witness.

22 (Record read as requested.)

23 THE WITNESS: All I know is that the date of
24 the book was -- I believe was 2001.

25 MR. MORENBERG: Q. Okay. And were there any